

Appl. No. 09/915,967  
Amdt. Dated November 7, 2005  
Reply to Office action of August 5, 2005  
Attorney Docket No. P12616-US1  
EUS/J/P/05-3278

**Amendments to the Drawings:**

The attached sheets of drawings include changes to Figure 3.

A Submittal of Drawing Replacement Sheet(s) is being filed concurrently herewith under a separate cover. For your convenience, a copy of that filing is attached.

Attachment: Annotated Sheets of Drawings Showing Changes  
Copy of Submittal of Drawing Replacement Sheets

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### **REMARKS/ARGUMENTS**

#### **Claim Amendments**

The Applicant has amended claims 1-11; claim 12 has been canceled. Applicant respectfully submits no new matter has been added. Accordingly, claims 1-11 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

#### **Examiner Objections – Drawings**

The Drawings were objected to because of several informalities in Figure 3. Corrections to the drawing are shown on the enclosed sheet. The Examiner's approval of the drawing changes is respectfully requested.

#### **Claim Rejections – 35 U.S.C. § 102(b)**

Claims 1-6, 7-9 and 11 stand rejected under 35 U.S.C. 102(b) as being anticipated by White, et al. (US Patent No. 6,069,890). The Applicant respectfully traverses the rejection of these claims.

The Applicant's invention discloses a method for routing call data between MSCs over virtual data trunks in an IP network. Data trunks connect an IP gateway to an MSC. IP packets received in the IP gateway from an associated MSC receive a source address of the IP gateway and a destination address determined by the data trunk that carried the IP packets. The addresses effectively define two ends of a "virtual data trunk" by providing IP gateway addresses where the data is transmitted to a receiving IP gateway. Each virtual data trunk connects to a T1/E1 Interface, which also provides an interface with an IP gateway. The virtual data trunk extends from one MSC's IP gateway to another MSC's IP gateway due to the specific address provided by each IP gateway associated with the MSC's in the IP network.

The White reference appears to disclose a system and method for providing PSTN services over the Internet. Internet Modules with SSP capabilities may be situated at the PSTN central offices and may be linked for signaling purposes (Col. 5, Lines 25-36). The system includes requiring a subscriber to dial a prefix, \*82, in order

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for the central office to direct a query message to the central office connected to the called station. A virtual connection is then set up between the Internet Modules in the central offices of the calling station and the called station. (Col. 5, line 64 – Col. 6, line 35).

The Applicant respectfully directs the Examiner's attention to amended independent claim 1. The amendments were made to distinguish the Applicant's invention from the White reference and support for the amendments is found in paragraphs 0023, 0024, and 0026, among other sources in the application.

1. (Currently Amended) A method of routing call data in a mobile communications system between two mobile switching centers (MSCs), comprising the steps of:  
receiving said call data, at an IP gateway from an associated source MSC via a trunk circuit;;  
packetizing said call data at said IP gateway for transmission over an IP network;  
determining the identity of the trunk circuit;  
attaching an IP destination address to said packetized call data representing a destination MSC associated with the trunk circuit;  
attaching a source address identifying the source MSC; and  
transmitting said packets over an IP network to the destination MSC. (emphasis added)

Amended claim 1 is distinguished from the White reference by the following: the Applicant's system is directed towards a mobile communications system connecting MSCs through the Internet and the White reference connects PSTN central offices/subscribers via the Internet; a "virtual trunk circuit" in the Applicant's invention is constructed between MSCs by attaching source and destination addresses to the transmitted data packets and the White reference establishes a virtual circuit between Internet Modules at the central stations. White's virtual circuit is temporary and may have a difference address every time a virtual circuit is attempted between the two central offices and in an alternate embodiment both a trunk circuit and a virtual circuit are established. In contrast with the White reference, the virtual trunk circuit of the Applicant's invention is effectively an Internet span between two stubs of a trunk circuit

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one stub (trunk circuit) linking a source MSC and a source gateway and the other stub linking a destination MSC and a destination gateway.

Applicant's claim 1 combination recites, among other features, attaching an IP destination address representing a destination MSC and a source address to the packetized data. This step is neither taught nor suggested by the White reference. The Applicant respectfully requests the withdrawal of the rejection of claim 1.

Amended independent claims 4, 5, 8 and 9 contain limitations analogous to the limitations in claim 1. This being the case, claims 4, 5, 8 and 9 and all claims dependent therefrom are distinguishable from the White reference and a Notice of Allowance is respectfully requested.

#### **Claim Rejections – 35 U.S.C. § 103 (a)**

Claims 10 and 12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over White et al. (US Patent No. 6,069,890) in view of Curry, et al. (US Patent No. 6,542,497 B1). In order to expedite allowance of this application, the Applicant has canceled claim 12 without prejudice. Therefore, this rejection with respect to this claim is deemed to be moot. The Applicant has amended claim 10 to better define the intended scope of the claimed invention.

The Curry reference is cited for disclosing a demultiplexer directing said call data to one of the at one least trunk circuits. However, Curry fails to disclose at least the limitation of "means for attaching the IP gateway address and an IP destination address to said data packets, wherein said IP destination address is based on the identity of said at least one trunk circuit," which is found in claim 9. This step is neither taught nor suggested by White or Curry or a combination of these references. The Applicant respectfully requests the withdrawal of the rejection of this claim.

#### **Prior Art Not Relied Upon**

In paragraph 4 on page 11 of the Office Action, the Examiner stated that the prior art made of record and not relied upon is considered pertinent to the Applicant's disclosure.

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### CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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